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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
SEATTLE DIVISION

SEP 14 2009

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
DEPUTY

Alicia Siler
17260 NE 8th St, Apt A
Bellevue, WA 98008

Plaintiff,

v.

Seattle Service Bureau, Inc
d/b/a National Service Bureau
c/o David B Conyers, Registered Agent
18820 Aurora Ave N, #205
Shoreline, WA 98133

Defendant.

Case No.:

Judge:

CV9 1307

COMPLAINT FOR DAMAGES
UNDER THE FAIR DEBT COLLECTION
PRACTICES ACT AND OTHER
EQUITABLE RELIEF

JURY DEMAND ENDORSED HEREIN

JURISDICTION AND VENUE

1. Jurisdiction is founded on 28 U.S.C. §1331 pursuant to the Fair Debt Collection Practices Act (FDCPA), 15 U.S.C. §1692. Venue is proper because a substantial part of the events giving rise to this claim occurred in this judicial district.

FACTS COMMON TO ALL COUNTS

2. Plaintiff is a "consumer" as defined by 15 U.S.C. §1692a(3).
3. Plaintiff incurred a "debt" as defined by 15 U.S.C. §1692a(5).
4. At the time of the communications referenced herein, Defendant either owned the debt or was retained by the owner to collect the debt.
5. Defendant is a "debt collector" as defined by the FDCPA, 15 U.S.C. §1692a(6).
6. Plaintiff filed this claim within the timeframe permitted under the FDCPA.
7. In or around April 2009, Defendant telephoned Plaintiff's mother ("Mother").



09-CV-01307-CMP

8. During this communication, Mother notified Defendant that Defendant could not reach Plaintiff at Mother's residence.
9. During this communication, Mother requested that Defendant cease further telephone calls to Mother regarding Plaintiff's debt.
10. Despite Mother's notice, Defendant telephoned Mother on numerous occasions throughout April and May 2009.
11. During several of these communications, Mother again notified Defendant that Defendant could not reach Plaintiff at Mother's residence.
12. During several of these communications, Mother again requested that Defendant cease further telephone calls to Mother regarding Plaintiff's debt.
13. On or around May 26, 2009, Defendant telephoned Mother's residence.
14. During this communication, Mother again notified Defendant that Defendant could not reach Plaintiff at Mother's residence.
15. During this communication, Defendant falsely represented that Plaintiff provided Mother's telephone number as a contact number for Plaintiff.
16. Defendant damaged Plaintiff emotionally and mentally and caused Plaintiff substantial anxiety and stress.
17. Defendant violated the FDCPA.

COUNT ONE

Violation of the Fair Debt Collection Practices Act

18. Plaintiff incorporates each of the preceding allegations as if specifically stated herein.
19. Defendant violated 15 U.S.C. §1692c in that it communicated with a third party and failed to comply with 15 U.S.C. §1692b.

COUNT TWO

Violation of the Fair Debt Collection Practices Act

20. Plaintiff incorporates each of the preceding allegations as if specifically stated herein.
21. Defendant violated 15 U.S.C. §1692c in that it communicated with a third party more than once and is without justification for multiple contacts.

COUNT THREE

Violation of the Fair Debt Collection Practices Act

22. Plaintiff incorporates each of the preceding allegations as if specifically stated herein.
23. Defendant violated 15 U.S.C. §1692e by making misrepresentations during its communications with Plaintiff.

COUNT FOUR

Violation of the Fair Debt Collection Practices Act

24. Plaintiff incorporates each of the preceding allegations as if specifically stated herein.
25. The Defendant violated 15 U.S.C. §1692f in that its actions were unfair and/or unconscionable means to collect the debt.

JURY DEMAND

26. Plaintiff demands a trial by jury.

PRAYER FOR RELIEF

27. Plaintiff prays for the following relief:
- a. Judgment against Defendant for actual damages, statutory damages, and costs and reasonable attorney's fees pursuant to 15 U.S.C. §1692k.

b. For such other legal and/or equitable relief as the Court deems appropriate.

RESPECTFULLY SUBMITTED,

Legal Helpers, P.C.

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